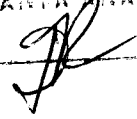


FILED

2016 FEB -5 PM 4:00

CLERK U.S. DISTRICT COURT  
CENTRAL DISTRICT OF CALIF.  
SANTA ANA

BY

1 Name: LAWRENCE McDavid2 Address: 9163 Santa Monica Blvd 5th3 Beverly Hill, CA 90210

4 Phone: \_\_\_\_\_

5 Fax: \_\_\_\_\_

6 In Pro Per

7  
8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA

10 LAWRENCE McDavid

11  
12 Plaintiff

13 Ralphs Corp.

v.

14  
15 Defendant(s).

CASE NUMBER:

SACV16-00205 DOC 1 JCGX

To be supplied by the Clerk of  
The United States District Court

Complaint

See pag

No sums

1 ON Feb 5<sup>th</sup> 2015, BETWEEN 12:45 pm to 1:45 pm plaintiff ENTERED A Ralph's in the  
 2 city of SAN JUAN CAPISTRANO to MAKE A PURCHASE in the deli department  
 3 of store, AS plaintiff WAS WAITING TO BE CALLED NEXT BY A Ralph deli employee  
 4 WORKING BEHIND THE deli COUNTER, SERVING THE CUSTOMER IN FRONT OF plaintiff  
 5 Ralph's deli EMPLOYEE DOE #1 SAID TO plaintiff IN A LOUD VOICE, hey !! why ARE  
 6 SCARING, MY NEIGHBOR, plaintiff RESPONDED BY SAYING EXCUSE ME? TO WHICH  
 7 Ralph deli EMPLOYEE RESPONDED BY REPEATING HERSELF AGAIN BY SAYING why ARE you  
 8 COMING AROUND SCARING MY NEIGHBOR, you SCARING her, she's AFRAID of you, to  
 9 WHICH plaintiff RESPONDED, EXCUSE ME, I DON'T KNOW WHO YOU ARE TALKING  
 10 ABOUT, TO WHICH Ralph deli EMPLOYEE DOE #1 RESPONDED, THE WOMAN WITH  
 11 THE BLONDE HAIR, plaintiff RESPONDED WHAT WOMAN WITH BLOND HAIR, TO WHICH THE  
 12 Ralph's deli EMPLOYEE DOE #1 RESPONDED THE WHITE LADY WITH BLONDE, WHO DRIVES  
 13 A WHITE CAR & LIVES ON Millpond, she MY NEIGHBOR, why ARE you SCARING  
 14 her, Ralph deli EMPLOYEE DOE #1 SAID she LIVED ON OCEAN St NEXT TO this <sup>MARINE OR</sup>  
 15 lady with blonde hair, AT THE TIME Ralph deli EMPLOYEE DOE #1 IS SAYING THIS  
 16 IN A VERY LOUD VOICE, THERE WERE THREE WHITE WOMEN & ONE WHITE GENTLE  
 17 MAN STANDING AROUND ME AND THE deli COUNTER, AND ONE OF THE THREE WHITE  
 18 WOMEN A Ralph's deli EMPLOYEE DOE #2 WHO HAPPENED TO BE STANDING NEXT TO  
 19 THE Ralph's deli EMPLOYEE MAKING THESE LOUD STATEMENTS TO plaintiff IN THE  
 20 STORE WITHIN EAR-SHOT OF OTHER CUSTOMERS WHO CLEARLY HEARD & WERE  
 21 STANDING, AND STARING AT plaintiff IN A VERY UNCOMFORTABLE WAY, AS THE  
 22 Ralph's deli EMPLOYEE WAS MAKING THESE LOUD AND EMBARRASSING STATE-  
 23 MENT ABOUT plaintiff FOR EVERYONE TO HEAR, SPREADING INFORMATION  
 24 ABOUT plaintiff PERSON BUSINESS THAT WAS NOT HER TO TELL, WHILE ACTING  
 25 IN THE SCOPE AS AN EMPLOYEE, AGENT, ACTOR, OR SERVANT OF HER EMPLOY-  
 26 MENT, OR WHILE WORKING ON THE CLOCK IN THE SCOPE OF PERFORMING HER  
 27 DUTIES BEHIND Ralph deli COUNTER BETWEEN 12:45 TO 1:45 WHILE IN  
 28 A Ralph uniform WITH THE NAME OF Ralph, THEREBY REPRESENTING AS A

1 EMPLOYEE, OR AGENT OF RALPH'S, WITHIN RALPH PLACE OF BUSINESS, PERFORMING  
 2 HER JOB DESCRIPTION & DUTIES SET FORTH BY RALPH, AS A RESULT PLAINTIFF HAS  
 3 SUFFERED, THE EMBARRASSMENT WITHIN THE COMMUNITY OF SAN JUAN,  
 4 BEING SHUNNED PUBLICLY BY THOSE WHO USE TO SPECK, STARES, WHISPERING  
 5 PLAINTIFF QUICKLY LEFT THE STORE AND HAS NEVER RETURNED TO EMBARRASSED  
 6 TO GO IN, AS GOING TO RALPH'S HAS RUINED MY REPUTATION WHICH THIS  
 7 COMMUNITY, SAN JUAN IS A VERY SMALL COMMUNITY, WHERE GOSSIP &  
 8 WORD TRAVEL FAST WHETHER REAL OR IMAGINED, WHEN PLAINTIFF GOES INTO  
 9 STORE PEOPLE ARE LOOKING AT PLAINTIFF IN WAYS THAT ARE NOT INVITING  
 10 THIS IS THE RESULT OF RALPH'S DELI EMPLOYEE DOE#1 WHILE WORKING IN THE  
 11 SCOPE OF HER EMPLOYMENT WITHIN RALPH BUSINESS AND CARRY OUT  
 12 THE BUSINESS OF RALPH'S, THAT PLAINTIFF HAS NO OTHER RECOURSE  
 13 BUT TO BRING/FILE THIS LAWSUIT, FOR DEFAMATION/SLANDER  
 14 FOR DESTROYING PLAINTIFF'S RIGHT TO (PRIVACY), AND TO BRING THE  
 15 LAWSUIT UNDER THE DOCTRINE OF RESPONDENT SUPERIOR & NEGLI-  
 16 GENCE, THAT RALPH DELI EMPLOYEE, WORD SPOKEN FROM DOE#1 WAS  
 17 DEFAMATORY CITING BROWN V. COLONIAL STORE 101 GA. APP 154 (1964)  
 18 SEEKING A JURY TRIAL, ASKING FOR PUNITIVE, COMPENSATORY, OF  
 19 \$5,000,000 EACH

20  
 21  
 22  
 23  
 24  
 25  
 26  
 27  
 28  
 Leanne M. Doe Feb 5, 2016